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December 17, 2025

**BY ECF**

Hon. Nina R. Morrison  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

Re: Bernadeau v. City of New York, et al., 25-cv-483 (NRM)(BMS)

Your Honor:

I am co-counsel for Plaintiff. I write in compliance with the Court's directive in the Court's July 25, 2025 Order that the parties file a joint discovery status report on or before December 18, 2025.

On August 19, 2025, counsel for Defendant City of New York sent Plaintiff an Offer of Judgment pursuant to Fed.R.Civ.P. Rule 68, offering to allow Vanky Bernadeau, as next friend and guardian of C.B., a minor, to take judgment against the City of New York in this action for the total sum of Ten Thousand and One (\$10,001.00) Dollars, plus reasonable attorneys' fees, expenses, and costs in full satisfaction of all federal and state law claims that Vanky Bernadeau, as next friend and guardian of C.B., may have to damages, or any other form of relief, arising out of the alleged acts or omissions of all of the Defendants. After consultations between counsel and C.B., Plaintiff Vanky Bernadeau timely accepted the offer on behalf of C.B. pursuant to Fed.R.Civ.P. Rule 68.

Plaintiff's counsel will be able to file the Rule 68 Offer, proof of acceptance, and proposed judgment, along with a proposed Infant Compromise Order and supporting papers consistent with Local Civil Rule 83.2 and New York Civil Practice Law and Rules § 1208, by December 29, 2025.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver